

The *Khorram* publication discloses a linear power amplifier that includes 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> transistor pairs 224, 226, and 228, respectively. As denoted by the name, each transistor pair includes two transistors where the drain of one transistor in the pair is connected to the source of the other transistor in the pair. Each transistor in the pair has a different signal connected to its gate. The 1st, 2nd, and 3rd transistor pairs are connected such that the gate of each first transistor of each pair is connected to a common input signal and the drain of each second transistor of each pair is connected to a common component. Even with this configuration, however, the *Khorram* patent still fails to remedy the deficiencies of the *Pozgay* and *Saxler* publications.

Particularly, each of Applicants' independent claims 1 and 8 recite, in part, an AlGaN amplifier connected to the antenna, wherein the amplifier includes a plurality of AlGaN amplifiers connected such that **each amplifier has a common drain connection and a common gate connection**. In contrast, even if the 1st, 2nd, and 3rd transistor pairs can reasonably be considered as a single transistor, each transistor pair still does not have a common gate connection and common drain connection as recited in Applicants' claims. As highlighted above, the *Khorram* publication discloses that a first transistor of each transistor pair shares a common drain connection and second transistor of each transistor pair shares a common gate connection. The second transistor of each pair, however, also has a unique gate connection (e.g., 1st enable 244, 2nd enable 246, 3rd enable 248). As a result, this reference fails to disclose or suggest a circuit in which **each amplifier has a common drain connection and a common gate connection**. Thereby the

*Khorram* publication does not remedy the acknowledged deficiencies resulting from the combination of the *Pozgay* and *Saxler* publications.

In summary, the *Pozgay*, *Saxler*, and *Khorram* publications when applied individually or collectively as alleged by the Examiner fail to disclose or suggest every feature and/or the combination of features recited in independent claim 1. For this reason, a *prima facie* case of obviousness has not been established.

To establish *prima facie* obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Moreover, obviousness "cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination." ACS Hosp. Sys. V. Montefiore Hosp., 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). Based on the foregoing discussion, Applicants respectfully request that the rejection of claim 1 and its corresponding depending claims be withdrawn.

**Conclusion**

Based on the foregoing remarks, Applicants respectfully submit that claims 1-9 are allowable and this application is in condition for allowance. Favorable consideration of the instant application is therefore respectfully requested. In the event any unresolved issues remain, the Examiner is encouraged to contact Applicants' representative identified below.

Respectfully submitted,

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